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TARGET CORPORATION

UNITED STATES OF DISTRICT COURT
DISTRICT OF NEVADA

DENISE AMBROSI, individually,

Plaintiffs,

v.

TARGET CORPORATION d/b/a TARGET, a
foreign corporation; DOES I-X; and ROE
BUSINESS ENTITIES XLXX, inclusive.

Defendants.

CASE NO.: 2:25-cv-00186-GMN-BNW

**PROPOSED DISCOVERY PLAN AND
SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE WITH
LR 26-1(b)**

**SPECIAL SCHEDULING REVIEW
REQUESTED**

Pursuant to Federal Rules of Civil Procedure 26(f), the parties conducted a scheduling conference on March 5, 2025. Pursuant to Local Rule 26-1(b), the parties now submit the following Proposed Discovery Plan and Scheduling Order.

1. Discovery Cut-Off Date. Defendant filed its Answer on January 3, 2025. The parties require 9 months (approximately 273 days), measured from the filing date of Defendant's Answer, January 3, 2025, to conduct discovery. Accordingly, the discovery cut-off date is **October 3, 2025**. LR 26-1(b)(1) provides that proposed discovery plans with discovery periods longer than 180 days require special scheduling review. LR 26-(a) provides that parties requesting special scheduling review must include a statement of the reasons why longer or different time periods should apply to the case.

1 The parties require 9 months (approximately 273 days) to conduct discovery because the parties
2 anticipate needing additional time to subpoena, receive medical records, provide those medical records
3 to the parties' experts, depose those medical providers and/or experts, and resolve any discovery
4 disputes arising therefrom. In counsel's experience, medical providers often take longer than
5 anticipated to provide complete sets of the requested documents, often necessitating discovery
6 extensions. To avoid filing requests for discovery extensions later in the case, the parties now seek 9
7 months for discovery.

8 2. Amending the Pleadings and Adding Parties. The deadline to amend the pleadings and
9 add parties is **July 3, 2025**.

10 3. Initial Expert and Rebuttal Expert Disclosures. The deadline to disclose experts is
11 **August 4, 2025**. The deadline to disclose rebuttal experts is **September 3, 2025**.

12 4. Dispositive Motions. The deadline to file dispositive motions is **November 3, 2025**.

13 5. Pretrial Order. The deadline to file a pretrial order is **December 3, 2025**.

14 6. Fed. R. Civ. P. 26(a)(3). The disclosures required by this rule and any objections to
15 them must be included in the joint pretrial order.

16 7. Alternative Dispute Resolution. The parties certify that they met and conferred about
17 the possibility of using alternative dispute-resolution processes including mediation, arbitration, and
18 if applicable, early neutral evaluation.

19 8. Alternative Forms of Case Disposition. The parties certify that they considered consent
20 to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short
21 Trial Program (General Order 2013-01).

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9. Electronic Evidence. The parties certify that they discussed whether to present evidence in electronic format to jurors for the purpose of jury deliberations. The parties agreed to produce evidence via electronic format.

IT IS SO STIPULATED.

Dated: March 14, 2025

Dated: March 14, 2025

LINCOLN, GUSTAFSON & CERCOS, LLP

PACIFIC WEST INJURY LAW

/s/Loren S. Young

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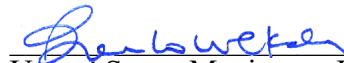
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Attorneys for Plaintiff, DENISE AMBROSI

IT IS SO ORDERED:



United States Magistrate Judge

Dated: March 17, 2025